

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT
OF NEW YORK

IN THE MATTER OF HYLAND,) Case No.: 18 Civ. 9031
Et al.)
Plaintiff,) OBJECTION TO PROPOSED SETTLEMENT
v.)
Navient Corp., et al.,)
Defendant.)

I, Joelle Dominique Millikin, since October 1st, 2007:

- (i) Have or had FFEL or Direct Loans serviced by Navient;
- (ii) Are or were employed full-time by a qualifying public service employer or employers for purposes of PSLF; and
- (iii) Spoke/communicated with a Navient customer service representative about subjects relating to eligibility for PSLF;

and I am, therefore, a class member.

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1 I have reviewed the proposed settlement between Hyland, et al. and Navient Corp., et
2 al., and I disagree with the terms for many material reasons, including:

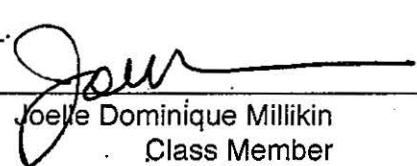
3 (i) My PSLF eligible loans are no longer serviced by Navient, and thus requiring
4 Navient to "design, implement, and maintain specific, substantial procedures
5 to enhance its PSLF-related practices" would provide no relief to me, if my
6 rights and interests were harmed by Navient's misleading behavior in the
7 past. The "toothpaste is already out of the tube," and these procedures would
8 in no way rectify the harm they may have committed to me previously;

9 (ii) Defendants creating a "non-profit organization formed to provide education
10 and student loan counseling to public service borrowers" would also provide
11 no benefit and no relief to me if my interests and rights were harmed by
12 Navient previously. Once you no longer have eligible loans for PSLF, you
13 cannot later convert them into PSLF eligible loans. No longer misleading or
14 misinforming customers in the future provides no relief to customers in the
15 past.

16 (iii) I am not a class representative, so I would not receive any financial
17 compensation, whether or not Navient significantly harmed my financial
18 interests or rights to receive relief through the PSLF program.

19
20 WHEREFORE, I OBJECT to the proposed settlement and I do not want to be included
21 in the agreement.

22 Dated this 22 day of July, 2020


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24 Joelle Dominique Millikin
25 Class Member
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